

DANIEL G. BOGDEN  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRYAN ALI FERRALES-PORTILLO,

Defendant.

2:15-mj-00397-VCF

STIPULATION TO CONTINUE  
TRIAL (1<sup>st</sup> REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda, Federal Public Defender, counsel for defendant **Bryan Ali Ferrales-Portillo** that the trial date currently set for Wednesday, July 22, 2015 at 9:00 a.m., be vacated and continued for thirty (30) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.

2. Counsel for the government has a calendar conflict.

3. The Defendant is not in custody and agrees to the continuance.

4. Denial of this request for a trial continuance would prejudice both the Defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

7. There have been no previous requests for a continuance of the trial in this case.

DATED this 16th day of July, 2015.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

By: /s/ Heidi A. Ojeda  
Heidi A. Ojeda  
Federal Public Defender  
Counsel for the Defendant  
**BRYAN ALI FERRALES-PORTILLO**

By: /s/ Nadia Ahmed  
Nadia Ahmed  
Special Assistant United States Attorney

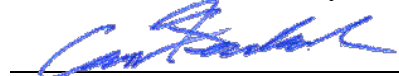
UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	2:15-mj-00397-VCF
	)	
Plaintiff,	)	
	)	ORDER CONTINUING TRIAL
vs.	)	
	)	
BYRAN ALI FERRALES-PORTILLO,	)	
	)	
Defendant.	)	

Based on the pending stipulation of counsel, and good cause appearing therefore, the court hereby finds that:

IT IS HEREBY ORDERED that the deadline to continue the trial, currently scheduled for July 22, 2015, at the hour of 9:00 a.m., is continued to 9:00 a.m., November 4, 2015.

DATED this 20th day of July, 2015



UNITED STATES MAGISTRATE JUDGE